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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS MOTION IN  
LIMINE #14 AND DEFENDANTS'  
RESPONSE**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal Motion in Limine #14 and supporting materials, as well as certain supporting materials in support  
8 of Defendants’ Response (the “Administrative Motion”). The Administrative Motion seeks an order  
9 sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s MIL #14	Portions highlighted in blue	Defendants
Waymo’s Ex. 2	Portions highlighted in green	Waymo
Waymo’s Ex. 3	Entire document	Defendants
Defendants Ex. 56	Portions highlighted in red	Waymo

16 3. Waymo has filed portions of Waymo’s MIL #14 and Waymo’s Ex. 3 under seal  
17 because they contain information that Defendants have designated confidential. Waymo expects  
18 Defendants to file one or more declarations in accordance with the Local Rules.

19 4. Portions of Waymo’s Ex. 2 and Defendants’ Ex. 56 contain or refers to Waymo’s  
20 asserted trade secrets, which Waymo seeks to seal. I understand that this information is maintained as  
21 secret by Waymo (Dkt. 25-47) and is valuable as trade secret to Waymo’s business (Dkt. 25-31). The  
22 public disclosure of this information would give Waymo’s competitors access to in-depth  
23 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. Portions of  
24 Waymo’s Ex. 2 and Defendants’ Ex. 56 also contain confidential business information belonging to  
25 Waymo, such as discussions regarding Waymo’s internal valuations of its business. The public  
26 disclosure of this information would give Waymo’s competitors access to Waymo’s own in-depth  
27 analysis of its business, and if such information were made public, I understand that Waymo’s  
28

1 competitive standing would be significantly harmed. Waymo's request to seal is narrowly tailored to  
2 only the confidential information.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
4 true and correct, and that this declaration was executed in San Francisco, California, on September 13,  
5 2017.

6 By /s/ Lindsay Cooper  
7 Lindsay Cooper  
8 Attorneys for WAYMO LLC  
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**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven